

1 RENE L. VALLADARES  
Federal Public Defender  
2 Nevada State Bar No. 11479  
RYAN NORWOOD  
3 Assistant Federal Public Defender  
New Hampshire State Bar # 15604  
4 411 E. Bonneville, Ste. 250  
Las Vegas, Nevada 89101  
5 (702) 388-6577/Phone  
(702) 388-6261/Fax  
6 [Ryan\\_Norwood@fd.org](mailto:Ryan_Norwood@fd.org)

7 Attorneys for David Baltazar Valdez

8  
9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 DAVID BALTAZAR VALDEZ,  
15 Defendant.

Case No. 2:16-cr-150-KJD-PAL

**UNOPPOSED MOTION TO  
RELEASE PASSPORT**

16  
17 Certification: This motion is timely filed.

18 Comes now the defendant, David Baltazar Valdez (“Valdez”), by and through his  
19 counsel of record, Ryan Norwood, Assistant Federal Public Defender, and hereby moves this  
20 court to order the release of his passport. This motion is based on the points and authorities set  
21 forth below

22 DATED this 11<sup>th</sup> day of July, 2016.

23 RENE VALLADARES  
Federal Public Defender

24  
25 By: /s/ Ryan Norwood  
RYAN NORWOOD,  
26 Assistant Federal Public Defender

**POINTS AND AUTHORITIES**

1. The defendant, David Balthazar Valdez, initially appeared in Court on May 2, 2016. The court ordered his pretrial release, but required as a condition of that release that Mr. Balthazar surrender his passport to U.S. Pretrial Services.
2. On July 5, 2016, Mr. Valdez resolved this case via a plea to a petty offense. He was sentenced the same day. There was no custodial sentence.
3. The Court issued the judgment of conviction on July 8, 2016.
4. Since Mr. Valdez has waived his right to a trial, entered a plea, and been sentenced, he is no longer on pretrial release. Accordingly, his conditions of pretrial release are no longer in effect.
5. Mr. Valdez has accordingly requested that U.S. Pretrial Services return the passport that he surrendered. Pretrial Services, however, stated they would not do so without an order from this Court. It is not clear why such an order would be necessary, but Mr. Valdez submits the following motion to expeditiously resolve the matter.
6. The government's counsel, AUSA Jared Grimmer, states that he does not object to the request to release the passport.

**CONCLUSION**

For all the above reasons, Valdez would respectfully request the Court enter an order directing U.S. Pretrial Services to return his passport to him upon request.

RENE L. VALLADARES  
Federal Public Defender

By: /s/

RYAN NORWOOD  
Assistant Federal Public Defenders  
Attorneys for David Baltazar Valdez

1 **UNITED STATES DISTRICT COURT**

2 **DISTRICT OF NEVADA**

3  
4 UNITED STATES OF AMERICA,

5 Plaintiff,

6 v.

7 DAVID BALTAZAR VALDEZ,

8 Defendant.

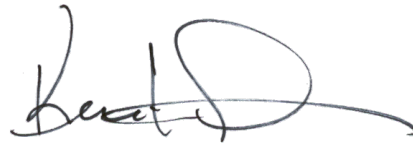
Case No. 2:16-cr-150-KJD-PAL

ORDER

9  
10 **ORDER**

11 Based on the pending unopposed motion, and good cause appearing therefore, the Court  
12 hereby orders that U.S. Pretrial Services for the District of Nevada shall upon request return the  
13 passport that the defendant, David Baltazar Valdez, surrendered to that agency as one of his  
14 conditions of pretrial release.

15 DATED this October 3, 2016.

16  
17 

18 UNITED STATES DISTRICT JUDGE  
19  
20  
21  
22  
23  
24  
25  
26